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for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

No. 08-01789 (SMB)

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Adv. Pro. No. 10-04741 (SMB)

Plaintiff,

v.

WILLIAM M. WOESSNER FAMILY TRUST,
SHEILA A. WOESSNER FAMILY TRUST,
WILLIAM M. WOESSNER individually, and as
Trustee of the William M. Woessner Family Trust and
the Sheila A. Woessner Family Trust,
SHEILA A. WOESSNER, individually, and as Trustee
of the William M. Woessner Family Trust and the
Sheila A. Woessner Family Trust, and

ELIZABETH WOESSNER,

Defendants.

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, Defendants the William M. Woessner Family Trust, the Sheila A. Woessner Family Trust, William M. Woessner, individually, and as Trustee of the William M. Woessner Family Trust and the Sheila A. Woessner, individually, and as Trustee of the William M. Woessner Family Trust and the Sheila A. Woessner Family Trust, by and through their counsel, Milberg LLP¹, and Elizabeth Woessner respectively (together with the Trustee, the “Parties”), hereby stipulate and agree to the following:

1. On December 9, 2011, the Trustee filed the Amended Complaint against Defendants.
2. On September 18, 2015, Defendants served an answer on the Trustee.
3. On August 19, 2016, the Trustee entered into a settlement agreement with Defendants pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [Dkt. No. 3181].
4. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and

¹ William M. Woessner, who was named in the adversary proceeding as a Defendant in his individual capacity and as Trustee of the William M. Woessner Family Trust and the Sheila A. Woessner Family Trust, passed away on or

Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee's claims against Defendants in the above-captioned adversary proceeding.

5. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective executors, administrators, heirs, agents, successors and assigns and upon all creditors and parties of interest.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: September 27, 2016

around January 2, 2016. Accordingly, Milberg is executing this stipulation on behalf of the Estate of William Woessner, rather than on behalf of William Woessner.

BAKER & HOSTETLER LLP

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Trust, the Estate of William M. Woessner,
Sheila A. Woessner, individually, and as
Trustee of the William M. Woessner Family
Trust and the Sheila A. Woessner Family
Trust*

ELIZABETH WOESSNER

By: /s/ Elizabeth Woessner

Elizabeth Woessner
Pro Se

SO ORDERED

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Dated: September 28, 2016
New York, New York